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DISTRICT OF MARYLAND

BY

DEPUTY

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July 21, 2025

The Honorable Ellen L. Hollander
United States District Court
101 West Lombard Street
Baltimore, Maryland 21201

Re: David J. Boshea v. Compass Marketing, Inc.
Civil Action No. ELH-21-0309

Dear Judge Hollander:

I am writing in connection with your ongoing review of five incidents in which statements—some made under penalty of perjury—were submitted by John White and Stephen Stern, asserting that Mr. White was the Chief Executive Officer of Compass Marketing, Inc. (“COMPASS”). As referenced in your memorandum (ECF 340), those assertions appear to be demonstrably false.

A related action, *Compass Marketing, Inc. v. Daniel White, et al.*, Case No. C-02-CV-23-0000601, also noted in your memorandum, is currently pending in the Circuit Court for Anne Arundel County (the “COMPASS State Case”). In that matter, Messrs. White and Stern continue to make the same misrepresentations regarding Mr. White’s purported executive role, echoing the claims made in the dismissed federal matter also cited in your memorandum.

In the COMPASS State Case, several requests for admission, interrogatories, and document production demands have been served upon COMPASS. The responses to those discovery requests are due prior to the scheduled trial date in the *Boshea* matter, currently set for August 4, 2025. For your convenience, I have enclosed representative portions of those requests, and I will ensure that any pertinent responses are forwarded for your review as they become available.

Additionally, Mr. White is scheduled to be deposed in Baltimore on July 24, 2025, in connection with the COMPASS State Case. Barring any further delays related to health or other issues, Mr. White is expected to be examined on the circumstances surrounding his resignation from any corporate role he thinks he ever had, in October 2021, any subsequent claims to leadership, and his personal business affiliations with

Mr. Stern, including their involvement in Smart Retail, Inc., and other associated entities.

I respectfully submit that the forthcoming discovery responses and deposition testimony will be of substantial value in evaluating the veracity of statements made to this Court in the *Boshea* proceedings. Based on the record to date, it appears there have been numerous material misrepresentations, as the court has already noted, the discovery should help the court determine if Messrs. Stern and White actually represent Compass Marketing Inc.

Please do not hesitate to contact me should you require additional documentation or clarification.

Respectfully,

A handwritten signature in black ink, appearing to read "M. R. White", written in a cursive style.

Michael R. White